

**Hamilton County, Ohio**  
**2011 Consolidated Annual Performance & Evaluation Report (CAPER) Narratives**

A. Assessment of One Year Goals and Objectives

The 2011 Action Plan for the Community Development Block Grant Program allocated \$680,300 for high priority infrastructure improvements, \$920,000 for high priority owner rehab and repair needs, \$293,450 for high priority planning and fair housing needs, \$366,000 for high priority social/public services, \$136,300 for medium priority park and recreation needs, \$100,000 to support the county-wide food pantry, \$290,000 for removal of blight and demolition (including acquisition of blighted properties, and county-wide spot blight demolition.) The Emergency Shelter Grant Program expended all of its first half funds to support a high priority homeless shelter program. A substantial amendment to our 2011 Action Plan was submitted to HUD in May 2012 in order to receive the second phase of 2011 ESG funding. Once received, those funds will be utilized for homelessness prevention activities administered through Hamilton County's CoC, Strategies to End Homelessness. The HOME Program allocated funds for four activities: Tenant Based Rental Assistance; Excel Development TBRA; both new construction and rehab of single family homes with down payment assistance for the home buyer; and finally, funding to address a gap in a multi-family senior rental housing development. All were high priority needs.

B. Affirmatively Furthering Fair Housing

Hamilton County has taken the following actions during the 2011 program year to affirmatively further fair housing and remove barriers to affordable housing:

1. Hamilton County contracted with Housing Opportunities Made Equal for \$75,000 for that agency to provide fair housing services, education, and complaint investigation within Hamilton County. The County has a long relationship with HOME and the agency is well suited to its mission in that it provides these services not only to Hamilton County but also to the City of Cincinnati, thus providing a single point of contact for the entire Hamilton County housing market.
2. Hamilton County has utilized both its CHDO set-aside and other HOME funds to work with neighborhood non-profits to rehab housing for first-time homebuyers. We will continue working with those non-profits during 2012 to develop and sell these single-family homes for low to moderate-income families in the villages Lockland, St. Bernard, and Elmwood Place. These homes represent some of the only affordable rehabbed housing that is available within these communities.

3. The County utilized a significant portion of its HOME Investment Partnerships funding for a Tenant Based Rental Assistance Program during 2011. The County dispersed \$1,034,000 in FY2011 for the in-house TBA program, and an additional \$115,504 for the funding provided to Excel Development to administer their small TBA program. Both programs are focused on providing Tenant Based Rental Assistance to families or individuals who have physical or mental disabilities. Eight of the TBA vouchers are set-aside for homeless families moving into transitional housing.
4. The County provided Community Development Block Grant funds for counseling for homeowners at risk of losing their homes to foreclosure. 58% of the households counseled were minorities, compared to a minority homeowner population in the County of 8%.
5. The County engaged as an active participant in the “Homeless to Homes” initiative, a planning process to identify and address coordination of housing and services for homeless individuals, many of whom are disabled. This process was completed in April of 2009. Subsequently, an implementation plan was formulated by many participants – some whom were involved in the original planning process. The County has been actively involved in this as well, and attends quarterly Steering Committee meetings.
6. Since 2008, the County has operated a TBRA program for the City of Cincinnati utilizing the City’s HOME funds. The Program was fully implemented in 2009 and leasing was increased in 2010 to take advantage of additional funds which became available. The contract was renewed for an additional year through June 30, 2012. This program faces an uncertain future due to the steep cuts in HOME Program funding. At the present time, the City is attempting to formulate a budget for a new contract that would be effective August 1, 2012. Based on estimates provided to date, significant reductions in the number of program participants may be necessary.

#### Analysis of Impediments Update

The City of Cincinnati and Hamilton County jointly requested that Housing Opportunities Made Equal, a Fair Housing Agency, conduct the Analysis of Impediments to Fair Housing Choice (A.I.) for the City and County jurisdictions. The A.I. was completed in May 2009, and in the A.I., 18 recommendations were made to respond to the issues of 1) NIMBYism based on stereotypes, 2) improving choice in the Housing Choice Voucher Program, 3) predatory lending and lending discrimination, 4) discrimination against people with disabilities, 5) a lack of accessible housing, 6) discrimination against families with children, and 7) Sexual Harassment. The City and County then began a series of monthly meetings with a working group made up of staff from Cincinnati Department of City Planning and Buildings, Department of the City Manager Office of Budget and Evaluation, Cincinnati Department of Community Development, and Hamilton County

Community Development, to address the report and its recommendations, and to create a Fair Housing Advisory Committee (FHAC) to advise the City and County on the plan and its final recommendation. The FHAC is charged with expanding on the draft responses to the identified impediments, including (1) determining goals and timelines to address each impediment, (2) resources or programs that will be used in financing the fair housing actions, (3) individuals, groups, or organizations to be involved in each action, including defining responsibilities, and (4) identifying a process for monitoring the progress in carrying out each action and evaluating its effectiveness.

The FHAC was formed, consisting of 16 representatives, including City and County staff, from agencies serving people with disabilities, fair housing advocates, affordable housing advocates, local banks and lenders, Legal Aid Society of Greater Cincinnati (Legal Aid), the Cincinnati Metropolitan Housing Authority (CMHA), and others. The City and County staff evaluated the responses and recommendations from the committee and have formulated this Fair Housing Action Plan. Updates are posted to this document as they are implemented.

The City and County staff may reconvene the larger FHAC committee during 2012. Suggestions were also made to form a “working group” made up of the City, County, CMHA, Housing Opportunities Made Equal, and Affordable Housing Advocates (AHA), and possibly landlord representatives. The group would work on the many impediments identified through the Plan where these entities are key players to discuss, for example, education, rent reasonableness, etc.

#### NIMBYism based on Stereotypes

- 1) The City and County need to work with CMHA to provide accurate information about the Housing Choice Voucher Program, including how the program works, the percentage of elderly and disabled people on the program, and the percentage employed. The communities also need accurate information on comparative rates of assisted housing concentration.*

Currently the Housing Authority keeps statistics on their clientele, including statistics on numbers of elderly, disabled, and employed receiving assistance. This information is brought to the public’s attention occasionally, when prompted. In addition, the local HUD office maintains a spreadsheet showing assisted housing by community and neighborhood in the City and County. The City and County would like to work with the Housing Authority and HUD to disseminate this information more widely. This could be done through a media campaign, or through other venues such as housing workshops. The City, the County, CMHA, Housing Opportunities Made Equal, and Affordable Housing Advocates will work together to conduct a joint informational campaign in 2011.

CMHA has the statistics readily available upon request, but not currently on their website. They agree that adding this information to their website would make this information more accessible to the public.

AHA performed a PR/Marketing on the “true face” of affordable housing. All the parties mentioned should get together to talk about what each of us is doing.

*2) The City and County should support, encourage, and participate with neighborhood groups who value inclusion and welcome new neighbors.*

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee to help implement it. Currently the City’s Neighborhood Summit and the County’s First Suburbs meetings provide venues for this initiative.

To tie fair housing issues more closely with development projects, the City and County will encourage developers awarded contracts to attend fair housing training. The City and County will require developers seeking public assistance for any project with at least 50 housing units to conduct an analysis of the impact of the development on racial integration in the community. The analysis will assist jurisdictions in determining whether support for the project is consistent with their obligation to affirmatively further fair housing.

Public Service Announcements will be used to disseminate information on Affordable/Fair Housing concerns. CMHA should provide outreach and data to the community and advertise in their newsletter.

CMHA had a booth at the Neighborhood Summit in 2011. CMHA is currently working on a marketing campaign, featuring “good stories” about their clients. CMHA has made changes to its monthly newsletter, utilizing an email format. This provides the opportunity to link to stories to outside information such as specific studies in an effort to educate further about fair housing. CMHA also continues to use its blog and twitter account as a vehicle for putting a face on affordable housing.

*3) The Cincinnati Planning Department and the Hamilton County Regional Planning Commission could take the lead in creating a positive image of diverse, mixed income communities.*

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee and the corresponding departments to help implement it. Currently the City’s Neighborhood Summit, the County’s First Suburbs meetings, and the Affordable Housing Advocates annual meeting provide venues for this initiative.

When 2010 census results are released and the Stable Integrated Communities research is updated, it is hoped that additional City neighborhoods and County communities will be added to the list of those that have been racially integrated for at least 20 years. The City Council and County Commission will honor the Stable Integrated Communities at public meetings. AHA is interested in being invited to any of the mentioned forums to present information about their group.

In February 2010 City Planning and Buildings held a kick off at the annual city-wide Neighborhood Summit for the start of the Comprehensive Planning process. This plan will be completed in 2012. City Planning will use the planning process and the Comprehensive Plan to help create a positive vision of diverse, mixed income communities.

The County will analyze the County's Compass Housing section for recommendations in this area, and follow up with those recommendations.

Housing Opportunities Made Equal obtained small grants from private foundations to sponsor the update of the Stable Integrated Communities research based on the 2010 Census. A number of additional communities, both in the City and jurisdictions outside the City, were found to have been racially integrated for at least 20 years. Housing Opportunities Made Equal published a glossy neighborhood guide highlighting these communities. The City, the County, Housing Opportunities Made Equal, and Bridges for a Just Community organized a Hidden Treasures Forum which was held in November 2011 to discuss the research and share best practices on building stable, diverse communities. The president of the County Commission and a representative of the City gave awards to the 28 communities.

The First Suburbs initiative is always looking for speakers for their meetings. Committees from FHAC and First Suburbs could meet to discuss possible speakers and to work in concert in some areas.

AHA remains interested in being invited to any of the mentioned forums to present information about their group.

*4) Elected officials and candidates should be asked to sign a pledge to refrain from inflaming racism and prejudice and to show respect for all citizens and their neighborhoods in campaign advertising and rhetoric.*

The City and County support this recommendation, and welcome assistance from groups such as the Affordable Housing Advocates, the League of Women Voters, and other to help implement it.

In 2006, the Affordable Housing Advocates (AHA) created a pledge form, which they had used in the past; however, the pledge has not been pursued because of the proliferation of candidate pledges for various purposes.

In February 2012, a candidate for state representative mailed campaign literature that called people receiving rental subsidies “a cancer that destroys our neighborhoods.” In response, Housing Opportunities Made Equal, Bridges for a Just Community, and the Cincinnati Human Relations Commission issued a public statement on Civility in Political Discourse.

#### Improve the Choice in the Housing Choice Voucher Program

- 5) CMHA, the City, and the County should collaborate on an active program to recruit landlords in low poverty areas and provide information and support to families with Section 8 Vouchers interested in making integrative moves.*

The City currently provides funding to Housing Opportunities Made Equal to provide some assistance to Voucher holders to find units in low poverty areas, and to recruit landlords in these areas. The County had provided funding in the past under its Section 8 Program, but no longer operates that program. It may be difficult to provide additional funding from the City or County due to public service limits on the CDBG Program funds, but that can be explored. The County operates a tenant based assistance program with HOME funds, and recruits landlords for that program. The City, County, and CMHA could form a working group to discuss this collaboration, and explore other funding sources to expand current efforts. The County will continue to provide funding in 2012 to Housing Opportunities Made Equal to continue the Mobility program. In order to reduce concentrations of assisted housing in certain areas of the County, Housing Opportunities Made Equal will help county residents with vouchers find housing in communities where there is currently little assisted housing, or in low poverty areas.

Discussions have been held with CMHA about “Go Section 8” (current tool being used to give clients information about available apartments), and HousingLocator.org.

In 2012 \$47,500 of City CDBG funding and \$24,000 in County CDBG funding will be allocated for the Section 8 Tenant Counseling and Placement program. Starting in 2012, CMHA will also support the Mobility program with \$25,000. The Mobility program recruits landlords and provides placement services to Section 8 voucher holders to assist them in moving to low-poverty, non-impacted areas.

*6) The City and County should ask CMHA to refrain from actions that limit housing choice such as using tenant-based vouchers to create project-based units or seeking ways to restrict access to certain neighborhoods.*

2010 Report

As referenced in the response to recommendation # 5, a working group made up of City, County, and CMHA representatives, along with other stakeholders, could discuss what limitations that Housing Authority can or cannot make, the reasons behind these actions, and what incentives they can implement to expand housing choice.

The Affordable Housing Advocates have recommended the following:

“While current HUD rules permit CMHA to project base up to 20% of its Housing Choice Vouchers (HCV), AHA urges that CMHA limit use of this program to a small percentage of funding. AHA believes CMHA should use Project Based Vouchers strategically to expand housing opportunities. In addition to using the option to geographically expand housing opportunities, CMHA should use it to assist low income households with special needs, who have trouble finding suitable housing with tenant-based vouchers and to promote renovation of good existing affordable housing as a way to improve neighborhoods. CMHA should not use project basing of HCV to limit housing choice.”

The City and County held discussions with CMHA, but did arrive at a conclusion about how to address this. CMHA does not intend to use project based Vouchers to limit housing choice.

This was discussed with AHA and Housing Opportunities Made Equal staff. AHA emphasized the last line, “CMHA should not use project basing of HCV to limit housing choice.” Some fair housing advocates insist that allocating vouchers to specific buildings or units always limits choice. CMHA has experienced transitional leadership for several years. They have had an interim Executive Director for several years, and much turnover in the CMHA Board of Directors. It is anticipated that this issue will be discussed in more detail when more permanent leadership is in place.

*7) The City and County should involve Section 8 tenants in community meetings, including upcoming meetings to develop a Cincinnati Comprehensive Plan and community meetings to discuss community development funding.*

The City and County are supportive of this recommendation, and normally include a representative of either the Housing Choice Voucher (HCV) Program, or other CDBG or HOME funded program on their respective committees, such as the County’s Community Development Advisory Committee (CDAC). In addition, given the formation of the Tenants United for Truth group, made up of HCV clients, the City and County will invite this group to participate and comment on various plans and funding recommendations.

Several fair housing advocates have volunteered to work with City Planning staff on the Housing and Neighborhood Development element of the City's Comprehensive Plan. Fair housing issues will be directly addressed in the plan. City Planning commits to conducting specific outreach to low-income tenants in the Comprehensive Planning process.

CMHA will help to outreach to their clients by: (1) putting information into Tenant Information Packets, (2) adding information to videos that play during recertification meetings, and (3) including links to these community meetings on their website.

*8) The City and County should work with CMHA to establish a Community Advisory Committee that includes Section 8 tenants and advocates, landlords, and representatives of communities concerned about the impact of families with Vouchers moving to their neighborhoods.*

The City and County support this recommendation, and have expressed an interest in serving on such a committee. CMHA is finalizing this committee and it will include representatives of the City and the County.

One meeting was held during 2011. CMHA has this specific committee on hold right now, due to legal questions about having CMHA Board members at a meeting not considered public. In the meantime, clients and citizens can access Board members at Board meetings. Also, clients or concerned citizens can attend Manager's Night-In, afterhours.

At meeting with AHA, discussed idea of having a working group (see under #1), to deal with other issues that the above mentioned committee would not take on. It is anticipated that this issue will be discussed in more detail when more permanent leadership is in place at CMHA.

#### Predatory Lending and Lending Discrimination

*9) Assertive law enforcement action is needed on fraudulent foreclosure prevention scams, the next generation of predatory lending that is targeting minority communities.*

The City and County support this recommendation, and will support initiatives that will assist in this effort. Legal Aid will draft correspondence for sign-on by the City and County to advise the Prosecutor's Office, Sheriff's Office, area police departments, and the FBI of the need for assertive law enforcement action in this area.



City and County met with the local Community Reinvestment Act representatives in September 2011. These representatives pledged to work on financial issues related to several impediments. As a result of this and larger community efforts, a Financial Fitness Day was scheduled as outlined below.

The City allocated \$137,000 in 2011 CDBG funding and \$120,000 in 2012 CDBG funding for the Emergency Mortgage Assistance program. Under contract with the Legal Aid Society the program provides up to three months of mortgage payments for low-income City of Cincinnati homeowners facing foreclosure due to predatory lending, job loss, illness, death of the primary wage earner, or other circumstances beyond their control. Homeowners may receive this assistance to bring their loan current if they have reestablished an income stream. All clients in mortgage trouble receive in-depth foreclosure prevention counseling and case management that links them with other social service agencies. This program addresses one of the predatory lending recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

The County allocated \$95,000 of 2011 CDBG funding and hopes to provide a similar amount in 2012 for foreclosure prevention counseling to assist in this area.

The City allocated \$262,458 in 2011 HOME funding for the Downpayment Initiative program.

Financial Education Day took place on January 28, 2012, at The Public Library of Cincinnati and Hamilton County Main Library. This financial education clinic was provided in partnership with PNC Bank, the Financial Planning Association of Greater Cincinnati, LifeSpan Ohio, Urban League of Greater Cincinnati, Smart-Money, Bank on Greater Cincinnati, United Way, and Working in Neighborhoods. The event featured four educational workshops throughout the day on topics including: Working with Your Bank Account, Managing Your Credit, Handling Foreclosure, and Tackling Debt. The free event, sponsored by PNC Bank, offered attendees personalized one-on-one financial consultations with certified professionals to receive financial advice. The event was free and open to anyone interested in free financial advice.

The event was staffed by the Financial Planning Association of Greater Cincinnati. In free 15 minute one-on-one private consultations, individuals were able to get advice on tax issues, small business development, investments, retirement planning, health/life insurance, estate planning, foreclosure or many other subjects. The personal consultations were operated on a first-come, first-served basis with no additional strings attached. Individuals did not have to share personal information, and there was no sale of products or services.

Financial Fitness Day was held on March 10, 2012 sponsored by Fifth Third Bank, Huntington Bank, PNC Bank, U.S. Bank and Xavier University. Programs addressed financial literacy, credit scores, protecting yourself from identify theft, starting your own business, foreclosure prevention, strategies to manage debt and accessing loans.

A Fair Lending Forum took place on April 5, 2012, at the Federal Reserve Bank Cincinnati branch. This roundtable discussion for housing and lending professionals discussed racial disparities as seen in the Home Mortgage Disclosure Act (HMDA) data.

### **Timeline: Ongoing**

*10) The City and County should request the banks in Hamilton County to review their HMDA data, and where racial disparities exist to conduct self-testing and establish Mortgage Review Committees to ensure that loan originators and underwriters are not allowing stereotypes and prejudice affect their decisions.*

The City and County support this recommendation. The City and County plan to hold an annual forum for mortgage lenders and brokers, to discuss how they handle and update their review process, and how they will address disparities found. Criteria will be developed for lenders and brokers to present their statistics from HMDA data and address any disparities that may exist.

As mentioned in #9 above, meeting took place with CRA representatives in September 2011 – they pledged to work on financial issues related to several impediments.

A Fair Lending Forum was held April 5, 2012, in response to this recommendation. It was sponsored by Housing Opportunities Made Equal, the City, the County, and the Federal Reserve Bank. The planning committee for the event included representatives of some of the largest lenders in the region.

*11) The City and County should work with major lenders to place more branches in minority and low- and moderate-income neighborhoods.*

The City and County support initiatives to encourage lenders to expand access to lending and banking services. In this time of cutbacks and consolidation, many banks are not expanding facilities, but if they are, we encourage them to consult with the City and County and Fair Housing agencies to determine where branches are needed. In addition, many banking services are accessible through the internet, so education and training in on-line banking could be provided by lenders to increase the accessibility to lower income and

minority consumers. The City and County will encourage banks to offer alternative methods of access to low – moderate income and minority households. This discussion could occur at the annual forum with lenders mentioned in the response to #10.

The Financial Stability Coordinating Council Task Force was established in 2010. The purpose of the task force is to work in collaboration with bankers, community-based representatives, local government officials and financial regulators to connect Greater Cincinnati's unbanked and under-banked individuals with appropriate and affordable, mainstream financial services.

Four committees, Financial Education; Product & Services; Tracking & Measurements; and Marketing & Community Outreach, have been working to complete respective tasks. National ad firm, Landor has been secured to provide all design materials pro bono. Surveys of all financial institutions are completed. Thirteen financial institutions & credit unions signed on.

As mentioned in #9 above, meeting took place with CRA representatives in September 2011 where they pledged to work on financial issues related to several impediments. Also as a result of these efforts a Financial Fitness Day was held in March 2012.

#### Discrimination against People with Mental Disabilities

*12) Training needs to be provided to government officials and local zoning boards in Hamilton County on the Fair Housing Act rights of people with disabilities and the liability of jurisdictions who violate the law.*

The City and County support this recommendation. Currently, training is provided by Housing Opportunities Made Equal to County personnel as needed. This effort could be expanded to include more County staff, City staff, and staff of other local zoning boards.

On April 26, 2011, fair housing training was provided for City and County Employees. Topics included introduction to fair housing laws, testing procedures, hot topics including harassment, discrimination against families, reasonable accommodation requirements, and accessibility issues. The training also addressed local government liability issues including exclusionary zoning, targeted enforcement, and affirmatively furthering fair housing. Thirty representatives were there from the Cincinnati property management and code enforcement staff, Cincinnati Police Department, Cincinnati Health Department, City Planning and Buildings Department, and City and County Community Development Departments.

The Hamilton County Regional Planning Commission provides a range of training for local zoning commissioners. Fair housing training specifically related to zoning issues will be included in their course offerings.

*13) The City Planning (& Buildings) Department and Hamilton County Regional Planning Commission should provide sighting assistance programs that enable the sighting of special needs housing by providing community education, dispute resolution services, and tools such as Good Neighbor Agreements.*

The City and County support this recommendation, and welcome assistance from the Fair Housing Committee and the corresponding departments to help implement this initiative. The Planning Partnership meets annually and sighting assistance could be discussed as a training topic. The City and County could provide awareness coaching to the communities, non-profits, and developers.

#### A Lack of Accessible Housing

*14) When the City and County issue occupancy certificates for new multifamily buildings, the inspectors should ensure that the minimal accessibility requirements of the Fair Housing Act are met. Additional training is needed to ensure inspectors understand that under the Fair Housing Act and the Ohio Building Code, regardless of how units in covered multifamily buildings are classified, they must be minimally accessible to persons with mobility impairments.*

The City of Cincinnati has taken several steps to address this impediment. In 1998 the City Council established the Cincinnati Accessibility Board of Advisors to consider and make recommendations to the City Manager on issues of accessibility for disabled persons related to future public projects within the City. Ordinance 0239-2009 was approved September 2, 2009 to broaden the purpose of the advisory committee to include making recommendations to the City Manager on all general matters of accessibility for disabled persons within the City. The City's Senior Buildings Plans Examiner, from the Department of Planning and Buildings, participates with this committee in an ongoing capacity as it works to identify mobility issues and solutions.

In 2009 Housing Opportunities Made Equal held training for Hamilton County staff from the divisions of Community Development, Planning, and Building Inspection to review Fair Housing laws. In January 2010, a more specific training was held with County Building Inspection staff to review the specific requirements related to accessibility. Plans are

underway to hold this specific training for existing Building Inspections staff on a bi-annual basis, with trainings held more frequently for new staff.

*15) The City and the County should expand their programs that provide accessibility modifications for existing housing to serve renters as well as homeowners.*

The City and County support this recommendation.

The County worked with organizations that assist renters with disabilities to determine need, scope, and final program design, and kicked off the program in September 2010. The County provided \$50,000 of 2010 CDBG funds and \$25,000 in 2011 CDBG funds for a program to provide grant funds for accessibility modifications for low income renters.

The County has committed \$25,000 in 2012 CDBG funding for accessibility modifications.

*16) Information on accessible rental units needs to be made more readily available.*

The City and County support this recommendation, and welcome input from the Fair Housing Committee and organizations that assist persons with disabilities to implement this recommendation.

The County encourages use of HousingLocator.org for clients in its Tenant Based Rental Assistance Program, which can note this in the database. Accessboard.gov is an additional site for assistance. CMHA is using a new service for their listings called “Go Section 8”. A campaign has been launched for this new website. The free website allows the landlord to upload their information on available housing.

CMHA is now promoting “Go Section 8” by disseminating information to clients, including in Mover Briefings, and putting brochures in their front lobby kiosk.

In 2011 \$500,000 of HOME funding was allocated to continue a contract with Hamilton County Community Development to operate and provide Tenant Based Rental Assistance (TBRA) to eligible households within the City of Cincinnati. The TBRA will cover a portion of the household rent payment for client households. The program is marketed to persons with disabilities. This program addresses one of the lacks of accessible housing recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Due to HOME program reductions of 52% in the past two years of funding, the City is reevaluating the funding level of the TBRA program.

### Discrimination against Families with Children

*17) A significant marketing campaign could open the housing market to families by raising public awareness that housing discrimination against families with children is illegal. It would encourage parents who experience discrimination to call Housing Opportunities Made Equal and would educate the smaller landlords who receive no professional training.*

The City and County support this recommendation. The Hamilton County Auditor tracks owner occupancy versus rentals for tax discount purposes, so this information could be used to help pinpoint owners of rental properties for educational mailings.

Proclamations are issued and special attention is paid to this issue during Fair Housing Month. Flyers/brochures will be placed at different locations such as the Department of Community Development, City Planning and Buildings, the Permit Center, and the Hamilton County Administration Building on an ongoing basis.

Conduct a marketing campaign for families. Currently there is training being provided for landlords. The City and County should meet to strategize on how to market and educate the community on fair housing laws. Some ideas that could be considered are showcasing this information on the “Gems of the Queen City” CitiCable show, or on other television shows or other social media. The City and County will work with Housing Opportunities Made Equal to coordinate this to begin in 2012.

Housing Opportunities Made Equal provides training to landlords via the Real Estate Investors Association (REIA) meetings on an annual basis. Additional training is available free of charge to individuals or organizations. In response to an increase in the number of complaints in 2011, Housing Opportunities Made Equal implemented a radio campaign to increase awareness of discrimination against families with children and the closely related issue of sexual discrimination.

The County staff administering Tenant Based Rental Assistance will add this discrimination awareness training to those people receiving TBRA. The City and County will direct the Strategies to End Homelessness, formerly Cincinnati Continuum of Care, to add this training to their programs assisting individuals and families transitioning from shelters to rental housing. Additional public relations opportunities will be explored.

### Sexual Harassment

*18) Educate female tenants that sexual harassment by landlords is illegal and should be reported to Housing Opportunities Made Equal. Target the message to female university students and Section 8 tenants who are particularly vulnerable because of their age and low-income.*

The City and County support this recommendation. Input from the Fair Housing Committee is now being evaluated and will be added to this response.

The City of Cincinnati allocated \$214,500 in 2010 CDBG funding to carry out its fair housing activities. This will be under contract with Housing Opportunities Made Equal to promote equal housing opportunities for all home seekers regardless of race, sex, color, nationality, religion, handicap, or familial status and to reduce unlawful discrimination in housing and increase integration throughout Cincinnati's neighborhoods. The program does complaint intake, investigation, counseling, and files legal complaints against persons, firms, or organizations suspected of discrimination in housing. This program addresses many of the resolution of illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio. The County provides \$75,000 of CDBG funding to Housing Opportunities Made Equal each year to fund similar activities.

In 2010 the City also allocated \$187,000 in CDBG funding for the Tenant Representation Project (TRP) administered by the Legal Aid Society. The project provides legal representation for low and moderate-income tenants in the City of Cincinnati. The TRP prevents homelessness by stopping unlawful evictions, corrects illegal lockouts and utility shutoffs, and requires landlords to complete repairs to make rental units decent, safe, and sanitary. The project also prevents retaliation against tenants who ask the City Building and Health Departments to inspect for code violations. This program addresses one of the illegal practices recommendations outlined in the 2009 Impediments to Fair Housing Choice in Hamilton County, Ohio.

Housing Opportunities Made Equal launched for the first time a radio campaign on the topic of sexual harassment.

CMHA offers education during their Housing Choice Vouchers (HVC) briefings on the issue. CMHA also suggested they could add information about this into the Fair Housing section of their Tenant Handbook that is given to clients at the initial Briefing.

Housing Opportunities Made Equal should provide ongoing training to the Police Department on sexual harassment, due to the number of complaint calls they receive on the issue. Police officers will learn to refer women to Housing Opportunities Made Equal if the complaint involves housing, but is not criminal.

The County or City should take the initiative to ask Sheriff or police departments to invite Housing Opportunities Made Equal to provide training. Housing Opportunities Made Equal has lost touch with police officers and needs to re-establish a relationship.

The City allocated \$214,500 in 2011 of CDBG funding, and the County allocated \$75,000 in CDBG funding to carry out fair housing activities contractually with Housing Opportunities Made Equal.

For 2011 \$187,000 of CDBG funding was allocated, for the Tenant Representation Project (TRP) administered by the Legal Aid Society.

As mentioned above, Housing Opportunities Made Equal provides training to landlords via the Real Estate Investors Association (REIA) meetings on an annual basis. Additional training is available free of charge to individuals or organizations. In response to an increase in the number of complaints in 2011, Housing Opportunities Made Equal implemented a radio campaign to increase awareness of discrimination against families with children and the closely related issue of sexual discrimination.

The County staff administering Tenant Based Rental Assistance will add this discrimination awareness training to those people receiving TBRA. The City and County will direct the Strategies to End Homelessness, formerly Cincinnati Continuum of Care, to add this training to their programs assisting individuals and families transitioning from shelters to rental housing. Additional public relations opportunities will be explored, including CitiCable shows.

### Conclusion

These recommendations will be reviewed quarterly by City and County staff in a formal setting to track progress in each of the areas of the Fair Housing Action Plan. Staff will convene the Fair Housing Advisory Committee as needed to add additional input on progress, and formulate new or change existing recommendations. Formal reporting to HUD will be done on an annual basis in conjunction with the CAPER.

### C. Affordable Housing

People Working Cooperatively (PWC) completed repair jobs for 580 clients to help maintain habitability of their homes. Cincinnati Housing Partners completed and sold one new home and continued to rehab two others. The Tenant Based Assistance



Program assisted an average of 202 client families during the program year (179 through the in-house program and 23 through Excel Development). All of the new clients served by the Tenant Based Assistance Program during 2011 were persons with special needs relating to disabilities, or homeless families.

In its 2010-2014 Consolidated Plan, Hamilton County estimated that 6,062 rental households were in need of priority rental assistance because of cost burden greater than 50%. The County also assigned high priority to assisting rental households with incomes below 50% of the median. Similarly, 6,360 owner-occupied housing units were identified as high priority because of cost burden greater than 50%. (See Housing Needs Summary Table of the Hamilton County Consolidated Plan.) Of the 580 homeowners assisted by People Working Cooperatively (PWC) 276 were extremely low income owner households, and 304 were low income owner households. The Hamilton County Housing Rehab and Sewer and Water-tap program assisted 23 households during the program year, of which 9 were extremely low-income, 9 were low-income and 5 were moderate-income households. All 202 households assisted under the Tenant Based Assistance Program were low or extremely low-income. All the renter and owner benefiting households identified above met the Section 215 definition. The actual number of households assisted represented a very small percentage of the owners and renters who were identified with priority needs. The mismatch between need and housing units assisted is a result of insufficient financial resources.

#### D. Continuum of Care Narrative

##### Homeless Needs

Actions taken to address the needs of homeless persons: The City of Cincinnati, Ohio addresses the needs of homeless persons through Strategies to End Homelessness, Inc. (STEH) (formerly known as the Cincinnati Hamilton County Continuum of Care for the Homeless [CoC]). STEH covers two jurisdictions – the City of Cincinnati and Hamilton County, Ohio. These jurisdictions have worked together on developing and implementing a combined strategy since 1996. The goals and objectives are identical in each of the jurisdictions' Consolidated Plans that have been approved by the City Council and Mayor of the City of Cincinnati and the Hamilton County Commissioners.

The lead entity is STEH, who is responsible for all process staffing. Staff responsibilities include: facilitation of the year-round planning, coordination and program implementation, processes for homeless housing and services within the jurisdiction, and facilitation of the annual grant application process to HUD and other collaborative grant initiatives. The City of Cincinnati is responsible for funding/contracting with STEH, Inc. to provide strategic planning, data analysis, implementation and oversight.

STEH facilitates a single, coordinated and inclusive system and process for planning and management of the local (City of Cincinnati and Hamilton County) Continuum, including planning for homelessness prevention, and provision of services to persons on the streets, within emergency shelters, in transitional housing facilities and housed within permanent supportive housing programs.

The Homeless Clearinghouse, is the coordinating body which oversees the local CoC funding process and the establishment of community funding priorities. It is composed of representatives from each of the following: The City of Cincinnati Department of Community Development; Hamilton County Community Development Department; The Veteran's Administration; the Greater Cincinnati Coalition for the Homeless; Health Care for the Homeless programs, Dept. of Education Homeless Liaison, CoC funded agencies, and each of the Working Groups of STEH. The Clearinghouse meets monthly, and the Clearinghouse provides year-round coordination, planning, program development, funding, program/housing support, and technical assistance for the local CoC funding process.

The Working Groups of the local Continuum of Care for the Homeless are active, inclusive entities designed to provide direct input in planning, implement planning initiatives, coordinate providers' day-to-day activities, reduce/eliminate duplicative efforts, and actively promote best-practice methodologies. These working groups provide the framework to ensure ongoing, active participation in the CoC process of the entire community including: veterans services, organizations representing persons with special needs or disabilities, faith-based and community-based organizations, state and local governmental agencies, Public Housing Authority's, housing developers law enforcement, hospital and medical services, funders, local businesses and homeless/formerly homeless persons. Each working group listed below plays a unique role in our Continuum's process of transitioning homeless persons into housing.

Working Group	Focus Area	Prime Activities
Family Shelter Partnership Program (FSPP)	Families in shelter	Coordinating quality case management Coordinating mainstream resources (Temporary Assistance for Needy Families, Food Stamps, Children's Health Insurance Program, Medicaid, Child Care, Child Protection)
Homeless Outreach Group (HOG)	Street homeless & chronically homeless	Coordinating outreach efforts Increasing access to housing/services directly from the streets
HMIS Advisory Committee	HMIS quality and Integrity	Implementing Homeless Management Information System Policy/Procedure Development & Oversight

Permanent Housing Group	Supportive Housing Program permanent housing for the disabled	Promoting best practice efforts in housing and case managing homeless persons with special needs (MH, SA, HIV/AIDS, dual disabilities, etc.)
Shelter Plus Care Work Group	Shelter Plus Care housing programs	Increasing community access to Shelter Plus Care housing
Transitional Housing Group	Supportive Housing Program transitional housing programs	Dealing with issues of access and capacity in the area of transitional housing

In addition to the above permanent working groups, the Homeless to Homes Shelter Planning Group is an ad-hoc committee tasked with the development of the emergency shelter facilities and corresponding shelter services improvements called for in the Homeless to Homes plan, which was developed for and adopted by Cincinnati City Council. This group will likely continue to meet until all facilities are in place, in approximately 2014.

To further ensure there are no duplicative efforts in coordination and planning for homeless housing and services the City of Cincinnati contracts with Strategies to End Homelessness for these functions. Since 2004, the Continuum of Care Lead Agency (now STEH) has convened the process for developing the Homeless/Special Needs Section of the Consolidated Plans of both the City and Hamilton County. This collaborative effort ensures that our community has one consistent and consolidated plan for all components of the CoC (prevention, outreach, intake, emergency shelter, transitional housing, and permanent supportive housing)

Cincinnati/Hamilton County CoC agencies have been awarded over \$12 million from the 2011 HUD CoC process, of which approximately \$2.6 million was awarded to new projects. Since 1996, the total amount of money brought into the City of Cincinnati and Hamilton County through the HUD CoC process is over \$134 million.

#### Homeless Prevention

The Stimulus funded Homeless Prevention Program (HPRP) is a short term (up to three months) program designed to help families and individuals most at risk of homelessness and who without this assistance would become homeless. Activities eligible for financial assistance include rent, utility bills, security deposit, and utility deposit. The screening criteria for accessing the HPRP Prevention Program funds include: having an income or income potential, income less than 50% of the Area Median Income, having no other financial resources or supports to remain stably housed, no stays in a homeless shelter in the past two years, a willingness to work with a case manager for up to three months and most importantly the ability to remain stably housed after receiving the temporary assistance.

The Stimulus funded HPRP Rapid Re-Housing Programs are designed to assist homeless individuals and families with few barriers to stability transition more quickly out of emergency shelter into stable housing. Clients who are identified as appropriate candidates for the Rapid Re-housing Programs must all: agree to up to 12 months of case management, have income or income potential, not have an income that exceeds 50% Area Median Income and most importantly, have the ability to remain stably housed after receiving temporary assistance.

The CoC Rapid Re-Housing for Families Demonstration Project was awarded in 2009 but not implemented until February 2010. The CoC Rapid Re-Housing for families serves families who have been identified as having a “moderate” level of barriers to obtaining and maintaining housing stability.

The HPRP funds have been dispersed in a partnership between Strategies to End Homelessness, Inc. and the United Way while other Homeless Prevention Programs continue to be operated in the same way they have been historically, and coordinated by the local FEMA Board. These programs provide emergency rent/mortgage/utility assistance etc., however, STEH and the United Way have begun discussions regarding how, between now and when HPRP funds are exhausted, to adapt the traditional Emergency Assistance Centers to follow the HPRP model and provide both a higher level of financial assistance combined with a higher level of case management services to prevent homelessness, and also lessen the burden on at-risk families and agency staff by eliminating the need for households to go to many separate agencies to receive the amount of assistance they need.

The FreeStore/FoodBank and Mercy Franciscan at St. John’s are the largest providers of prevention assistance. Mercy-Franciscan at St. John’s, the Salvation Army, and the Center for Independent Living Options have administered prevention programs targeted to prevent homelessness or homeless recurrence through an Ohio Department of Development- homeless support grant and when available in the past, local ESG funds. With these funds they pay emergency assistance designated toward prevention. FreeStore/FoodBank programs such as Direct Rent, which manages welfare checks for families, and the Payee Program, which provides a payee for SSI/SSA checks, ensures rental payments are made, and are critical homeless prevention activities. The Community Action Agency administers the community’s energy assistance prevention funds.

E. Other Actions

Other efforts made with regard to the Consolidated Plan and affordable housing in Hamilton County are summarized under the headings below.

Obstacles to meeting underserved needs - The primary obstacle to meeting underserved needs within Hamilton County is fiscal. The County’s housing, community development, and emergency shelter needs far outweigh available funding resources either from the

federal government or through state or local resources. Cuts in funding to the CDBG and HOME Programs have only exacerbated the problem.

Fostering and Maintaining Affordable Housing – The County implements several programs, described earlier, to foster and maintain affordable housing, such as the County-wide Housing Repair Program, the Water and Sewer Grant Program, and the CHDO Housing development program for Homeownership. Also, the County now operates the Neighborhood Stabilization Program, which is providing affordable housing for households up to 120% of median income. Affordable rental housing is maintained by continuing the TBA Program, as well as involvement in Affordable Housing Advocates meetings and committees. In August of 2008, the City of Cincinnati contracted with the County to operate a TBRA program for the City using City HOME funds. The City chose the County to operate the program, due to the County's successful operation of its own TBA Program for many years. The Program got underway in late 2008, and was fully leased at 85 households by October 2009. The City increased authorization for leasing due to additional funds available, and lease-up to the final number of 125 households was reached in March 2010. That level of funding continued through the 2011 program year.

The County committed \$300,000 of HOME funds to fill a gap in a HUD 202 project for elderly residents in the Village of St. Bernard. An agreement between the County and Volunteers of America, the developer, was executed in September 2011. Construction is now underway with a targeted completion date of late 2012.

Eliminating Barriers to Affordable Housing - This section is addressed in Section "B", Affirmatively Furthering Fair Housing.

Institutional Structure - Hamilton County enjoys active and successful participation among both public and private sectors, including numerous voluntary and non-profit groups and agencies in the development of housing and related activities. The County's strategy, as expressed in the Consolidated Plan, is to build on the strengths of the institutional capacity already in place.

Efforts to achieve cooperation and coordination with State, local and private agencies and institutions in the implementation of housing and related supportive services are numerous and on-going. Most obvious among these are the direct working relationships, cooperation and coordination inherent between the State and the County Department of Job and Family Services, the Community Mental Health and Recovery Services Board, and the Developmental Disabilities Board. In 2006, an alliance was formed among four non-profit Counseling agencies to provide foreclosure prevention counseling services and rescue funding to homeowners at risk of losing their homes through foreclosure, often as a result of predatory lending. A fifth organization has also

joined this alliance.

A significant change in institutional structure for assisted housing was the merger of the County's Housing Choice Voucher Program with the Housing Authority's, a process that began with discussions in the summer of 2005, began in earnest in January 2006 and was substantially completed by July 2006. Although there were many factions which did not agree with this decision, the merger has provided a single point of contact for the community for the Housing Choice Voucher Program.

In 2007, the Community Development Department was consolidated into the Regional Planning Department, to allow for greater coordination of services and plans. In late 2008, the process began to consolidate the County Departments of Public Works, Building Inspections, and Regional Planning Commission (including Community Development.) This consolidation was mostly completed by the end of 2009, and is creating better efficiencies, coverage of service, and coordination of planning, development, and services.

Public Housing Improvements/Resident Initiatives - The Cincinnati Metropolitan Housing Authority participates in the Capital Fund Program and is solely responsible for maintaining and reporting progress as prescribed by HUD. The applicable Capital Fund Program Annual Statement/Performance and Evaluation Report for the PHA has been completed by the Housing Authority and submitted to the County Community Development Department. However, the documentation is voluminous. While referenced and readily available, this information is not reproduced herein as a practical matter.

The County plans no specific action with regard to resident initiatives because that responsibility lies with the Cincinnati Metropolitan Housing Authority. However, the County actively communicates with the Housing Authority, and gives input to changes considered for the Community.

The County and CMHA signed a new Cooperation Agreement in January 2012 for housing to be developed in Hamilton County, outside of the City of Cincinnati. Execution of the agreement had been held up for many months based on a number of factors including a HUD investigation of the Housing Authority regarding exclusion of certain communities when acquiring housing for use in their programs. In addition, there was a perception within some communities in the County that a new cooperation agreement would increase the likelihood of public housing within their borders. Unfortunately, this perception caused a number of communities to opt out of the CDBG program for the 2012 program year. It is hoped that many of these communities will return in 2013, once misperceptions about the cooperation agreement have been dispelled.

Lead-Based Paint Hazard Reduction - Hamilton County follows all current regulations with regard to lead based paint. Units assisted with HOME TBRA funds are inspected annually for compliance with the Lead Based Paint regulations.

Program Compliance - County program staff do a periodic review of County administered housing, community development, and emergency shelter grant programs to ensure compliance with program and comprehensive planning requirements. Generally, a desk review is performed at least annually, and on-site monitoring visits are completed approximately every two years, depending on the amount of funding provided, risk analysis, and federal regulations. The preparation, dissemination, and review of the Consolidated Annual Performance and Evaluation Report (CAPER) also provides opportunities for performance review by both the federal agency and interested citizens.

Reducing the number of persons living below the poverty level - Community Development Block Grant, HOME, and Emergency Shelter Grant funds cannot be used to directly support the incomes of persons to reduce the overall number of persons living below the poverty level. The programs do, however, provide a number of support mechanisms to assist persons who are living below the poverty level. It is hoped that these supports, which range from rental housing assistance and counseling to direct food support from the FreeStore, to first month's rent and security deposit from Goodwill, will stabilize the lives of low income persons to permit them to take the actions necessary to improve their income and living standards.

F. Leveraging Resources

Many of the Community Development Block Grant projects also included contributions from local units of government to fully fund the activities. All of the social service providers assisted with Block Grant funds utilized other federal, state and/or local funds within their agency. All of the properties sold by our participating CHDO's utilized a first mortgage from a private sector lender in addition to a soft second mortgage provided by Hamilton County utilizing HOME funds. The HOME match requirements were met by counting State of Ohio funds used by the Mental Health and Recovery Services Board for its HAP rental assistance program.

G. Citizen Comments

On May 11, 2012, Hamilton County published a notice of the availability of its 2011 Consolidated Performance and Evaluation Report (CAPER). The notice detailed the programs covered by the Performance Report and invited citizens to obtain a copy of the report as well as to give comments. No comments were received by the May 26,

2011 deadline that was established in the Notice. Other than minor editing, the Performance Report submitted to HUD is the same document that was available for citizen review and comment.

#### H. Self Evaluation

In reviewing both the new and ongoing projects undertaken in 2011, it is evident that many projects were successful in providing help to communities and the County in general, by participating in the Community Development Block Grant Program. Homeownership counseling funded by Community Development Block Grant to help prevent foreclosures began in 2007 and was immediately used by all four counseling agencies to begin to assist homeowners, and funding continued to be used throughout 2011. Funding for Countywide spot demolition for various participating communities in the County to demolish vacant, abandoned, and blighted residential buildings, was reduced in 2011 due to lack of available funds. The ULAP Project for demolition of commercial structures has been very popular and addresses a need many communities are unable to undertake on their own. These programs, along with projects specific to the individual communities, have resulted in better visibility and functionality for these areas.

The attached chart, Summary of Specific Annual Objectives, outlines how projects carried out in 2011 provided decent housing, a suitable living environment, and expanded economic opportunity, principally for low and moderate-income persons.

Indicators that describe results of projects completed in 2011 are shown in the IDIS reports, attached as part of this CAPER.

Barriers that had a negative impact on fulfilling the housing strategy of providing homes to low-income homebuyers included the downturn of the economy and tightened credit requirements, which have put a damper on the CHDO activity of constructing and selling new homes. Cincinnati Housing Partners, the County's most tenured CHDO did very little new rehab work or construction in 2011 as they were actively trying to sell other homes and did not want a large inventory of houses that may not sell in this market. Our other CHDO, Working in Neighborhoods, began rehab work on three houses in the Village of Elmwood Place. The houses are scheduled for completion in August 2012. Efforts to find buyers for these homes are currently underway. Overall, one home was sold during the program year, two are nearing completion of rehab and are for sale and three others are in the midst of rehab.

#### **Certifications of Consistency**



Hamilton County, Ohio certifies that during FY2011, it provided Certifications of Consistency for HUD and other programs in a fair and impartial manner. The County further certifies that it did not hinder Consolidated Plan implementation by either action or willful action.

Performance Measures – see the accompanying Summary of Specific Annual Objectives chart to see the reports of actual measures for activities completed during the 2011 program year.

### **2011 Community Development Block Grant Program Narrative**

Community Development funds were used to meet priority needs identified in the Consolidated Plan as previously described under Section A of the Consolidated Plan Narrative. Community Development housing funds for fiscal year 2011 were used either to benefit low-to-moderate income persons or eliminate slums and blight. Community Development housing funded activities included homeowner repair provided through the non-profit People Working Cooperatively, and community run repair programs in Colerain Township, Forest Park, Golf Manor, and Springdale. All housing funds and most other Block Grant funds went to high need priorities established by the Consolidated Plan.

There were no significant changes in the Community Development Block Grant Program during fiscal year 2011.

In reviewing the implementation of the Community Development Block Grant Program for FY 2011, Hamilton County pursued all resources that were identified to support Community Development Block Grant funded activities. The County cooperated with other entities in seeking other resources that supported the Community Development Block Grant Program or related activities identified in the Hamilton County Consolidated Plan. In addition, all grant funds were used either to primarily benefit low to moderate income persons or to eliminate slum and blight. The portion of 2011 Community Development Block Grant funds used to benefit low to moderate income persons also exceeded the overall benefit standard.

In 2011, Hamilton County did not fund any projects which involved the involuntary acquisition or demolition of occupied or recently occupied homes or businesses; no relocation was triggered by either voluntary or involuntary acquisition.

Hamilton County did not undertake any direct economic development activities utilizing Community Development Block Grant funds. The County does provide some funding from its Planning and Administrative dollars to Hamilton County Development Company, for economic development planning studies.

Hamilton County funded a number of direct benefit activities that served a limited clientele. Activities benefiting seniors or persons with handicaps met the presumed benefit criteria of the Community Development Block Grant Program. Activities that did not meet the presumed benefit criteria qualified by collecting income information from the project beneficiaries to assure that at least 51% of the beneficiaries were low to moderate income.

Hamilton County received program income to its Community Development Block Grant Program from three sources during 2010. A majority of program income came from loan repayments from the Housing Rehab Program. A second source of miscellaneous income was from the rental of facilities developed using Community Development Block Grant funds that are rented during off hours when not used for their primary program purpose. The third source was from repayments from the Housing Repair Program. These repayments are from deferred loans that are repaid where the home is either sold or refinanced.

Hamilton County has not identified any Neighborhood Revitalization Strategy (NRS) areas in its jurisdiction for the CDBG Program.

### **2010 HOME Program Narrative**

2011 HOME funds were allocated for three projects plus program administration. Because Hamilton County has an adequate supply of rental housing in standard condition, HOME funds were primarily used to make that housing affordable to low income persons through a Tenant Based Assistance Program. The County allocated \$1,094,000 for the in-house Tenant Based Assistance Program for one year, and \$134,598 was allocated for the Tenant Based Rental Assistance Program run by Excel Corporation. Working In Neighborhoods was allocated \$194,100 in CHDO funds to support new construction and acquisition with rehab in the Village of Elmwood Place. This program makes home ownership available to low-moderate income home buyers within these municipalities. These rehabilitations are part of an overall program to upgrade the housing stock in this community. \$300,000 of HOME funds were utilized for rental housing gap financing for a Section 202 project to be developed by Volunteers of America in the Village of St. Bernard.

As part of its overall monitoring responsibilities, Hamilton County inspected various HOME assisted units during the past year. All units inspected either initially met or were repaired to meet Housing Quality Standards or local code.

The County has an Affirmative Marketing Plan that is included in all contracts for HOME projects, that specifies what the County and the developer will undertake in marketing

HOME assisted units. As specified in the documents executed between the parties, outreach to minority and women owned businesses is made as part of the affirmative action provisions of the documents. Statistics are reported by the developer to the County for inclusion in the Form HUD-40107, outlining minority and women owned businesses used in contracts. Also, reports on the race of homebuyers and occupants of the HOME rental units of the 202 project are/will be reported in the IDIS system.

### **2011 Emergency Shelter Grant Narrative**

Hamilton County's Emergency Shelter Grant (ESG) Program makes up a relatively small portion of the Continuum of Care that was developed jointly by the City of Cincinnati and Hamilton County, but its ESG expenditures are consistent with the goals, objectives, and priorities of the CoC. Because of the limited funding available to Hamilton County, the County has expended all of its 2011 first half Emergency Shelter Grant funding for one activity to simplify the administration of the Program. The activity, the Mt. Airy Shelter, provides dormitory living and associated social services for homeless men with alcohol and chemical dependency problems. This shelter need was identified as a high priority need in the Consolidated Plan. These ESG funds pay a portion of the operating costs of the Mt. Airy Center. Matching funds for the ESG grant are provided by other funding sources that Talbert House receives for Mt. Airy, such as VA and state funding. The facility was previously operated by the Hamilton County Department of Human Services, but due to funding cutbacks and change in mission, operations of Mt. Airy were transferred over to Talbert House, a successful bidder of the RFP issued by the City of Cincinnati.

A substantial amendment to our 2011 Action Plan was submitted to HUD in May 2012 in order to receive the second phase of 2011 ESG funding. Once received, those funds will be utilized for homelessness prevention activities administered through Hamilton County's CoC, Strategies to End Homelessness.